

Krystal N. Watts2501 Investigation Parkway
Quantico, VA 22135

Office: [REDACTED]

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PROFESSIONAL EXPERIENCE**Physical Scientist / Forensic Examiner**

Feb 2013 – Present

FBI Laboratory, Latent Print Operations Unit

Quantico, VA

Process and examine evidence for latent prints and compare those latent prints to known print records

Intern

Jun 2012 – Aug 2012

FBI Laboratory, Latent Print Operations Unit

Quantico, VA

Conducted research to determine optimal tape processing as to not interfere with DNA examinations

Criminal Justice Intern

Aug 2009 – May 2010

Washington State University Police Department

Pullman, WA

Recorded the known fingerprints of individuals

Scholastic Honors Intern

Jun 2008 – Aug 2008

FBI Laboratory, Latent Print Operations Unit

Quantico, VA

Researched chemical and physical methodologies for developing latent prints on deceased human skin

EDUCATION**Master of Arts in Forensic Psychology**

Aug 2011 – Dec 2012

Marymount University

Arlington, VA

Bachelors of Science in Biochemistry / Molecular Biology and Psychology

Aug 2006 – May 2010

Washington State University

Pullman, WA

Associate of Arts and Science

Sep 2004 – Aug 2006

Columbia Basin College

Pasco, WA

PROFESSIONAL TRAINING PROVIDED**FBI New Agent Training: Recording Major Case Prints**

May 2013 – Present

Quantico, VA

Advanced Techniques for Post-Mortem Fingerprinting

Aug 2018

Aug 2018

San Diego, CA

Los Angeles, CA

Latent Print Advanced Testimony Workshop

Aug 2015

Jun 2015

Sacramento, CA

Houston, TX

(continued)

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PROFESSIONAL TRAINING RECEIVED

Advanced Latent Print Examiner Training Concepts
Jul 2019

Quantico, VA

Palm Print Comparison Techniques
Jun 2019

Fairfax, VA

Logical Latent Analysis
Jun 2017

Quantico, VA

Analysis of Distortion in Latent Prints
Jun 2016

Quantico, VA

Probabilistic Approach to Evidence Interpretation
Sep 2015

Quantico, VA

IAI International Educational Conference, International Association for Identification
Aug 2015

Sacramento, CA

Exclusionology: Standards and Reducing Errors
Mar 2015

Quantico, VA

Latent Print Physical Scientist / Forensic Examiner Training Program, Federal Bureau of Investigation
Feb 2013 – Dec 2014

Quantico, VA

Reviewing and Understanding Current Research in Friction Ridge Examinations
Sep 2014

Quantico, VA

Cognitive Factors in Forensic Decision Making
Apr 2014

Quantico, VA

Defense Perspective on Latent Print Testimony
Apr 2013

Quantico, VA

TESTIMONY PROVIDED

U.S. v. Comegys
Nov 2015

Baltimore, MD

Rule 16 Summary of Testimony of Krystal N. Watts

The United States, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, hereby provides to the defendant a written summary of the testimony of Forensic Examiner Krystal N. Watts, of the Federal Bureau of Investigation's Latent Print Operations Unit in Quantico, Virginia, an expert in the analysis and comparison of friction ridge impressions, that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial. As required by the rule, the witness's qualifications, opinions, and basis and reasons for those opinions are included in this written summary.

Witness Qualifications

Forensic Examiner Krystal N. Watts (hereafter "FE Watts") has been employed with the Latent Print Operations Unit (LPOU) of the Federal Bureau of Investigation Laboratory in Quantico, Virginia since 2013. FE Watts successfully completed an approximate eighteen-month training program within the LPOU, including numerous fingerprint comparison exercises and tests, as well as two separate mentorships in the performance of casework, and was qualified by the FBI as a latent print examiner. FE Watts has previously been qualified as an expert in the area of friction ridge prints in federal court. FE Watts has an Associate of Arts and Science degree, Bachelors of Science degrees in Biochemistry/Molecular Biology and Psychology, and a Master of Arts degree in Forensic Psychology. Additional pertinent experience and continuing education are outlined in her Curriculum Vitae, which is attached.

Witness Opinions and Basis and Reasons Thereof

Foreword

Friction ridge skin is found on the fingers, palms, and soles of the feet. It consists of ridges (raised portions of skin) and furrows (space between the ridges) that form patterned arrangements. These arrangements are both persistent throughout life and unique from individual to individual, even distinguishing twins. Persistence and uniqueness are the foundational premises upon which friction ridge impressions (fingerprints, palm prints, and footprints) may be used for identification.

Friction ridge impressions are reproductions of the friction ridge arrangement resulting from the transfer of a substance, such as sweat or body oil, when the skin comes into contact with a surface. *Known* prints are intentional, controlled reproductions typically made using black ink on standard ten-print cards. *Latent* prints are chance reproductions that may require forensic light sources or chemical/physical processing to be detected. The prescribed sequence of examinations and processes depends upon the nature of the evidence, but primarily whether an item is considered porous or non-porous. Latent prints potentially suitable for comparison are photographed, and the photographs are subsequently examined with a magnifying glass and a sharp utensil for marking characteristics.

Latent print examiners follow a framework for decision-making referred to as ACE, which stands for Analysis, Comparison, and Evaluation:

- Analysis is the first step and includes the assessment of a print's anatomical origin and overall ridge flow, second-level characteristics (i.e. ending ridges, dividing ridges, dots, etc.), and visual distortion. A print with sufficient quantity¹ and quality² of information will be deemed potentially identifiable and therefore suitable for Comparison.
 - ¹There is currently no statistical basis for a minimum point standard. While the specificity of a print generally increases with the number of characteristics, it is also dependent upon the type, location, and overall spatial relationship of those characteristics—information that cannot be encapsulated by a numerical value.
 - ²The quality, or visual clarity, of a print will affect the degree of confidence in observed characteristics, and typically has an inverse relationship to quantity.
- Comparison is the direct side-by-side examination of a latent print and a known print. Due to skin pliability and variation in substance, surface, deposition pressure and movement, even prints from the same source are not expected to look like exact photocopies of each other. An examiner looks for both agreement (correspondence) and disagreement (discordance), and assesses whether the latter is due to distortion or an actual discrepancy in the friction ridge arrangement.
- Evaluation is the culmination of Analysis and Comparison, in which an examiner reaches one of three conclusions:
 - Identification – the two prints originate from the same source
 - Exclusion – the two prints originate from different sources
 - Inconclusive – neither an identification nor an exclusion decision can be reached

While ACE is an inherently subjective process and interrelated with an examiner's skills, knowledge, experience, education, and training, peer-reviewed ground truth studies have demonstrated examiners to be highly accurate and reliable. In accordance with external and internationally-recognized accreditation requirements, the FBI Latent Print Operations Unit also implements a quality assurance process that includes independent verification and blind verification to mitigate error.

Case at Hand

FE Watts received, examined, and processed evidence associated with the extant case and issued results under Lab #2019-01736-4 (see the attached Lab Report). Upon visual examination of Lab Item 8, the rearview mirror from a 2007 Chevrolet Silverado, FE Watts detected one latent print potentially suitable for comparison on the glass portion of the mirror. FE Watts had the print photographed by an FBI latent print photographer prior to proceeding with the remaining prescribed examination and processing techniques. FE Watts confirmed the photograph to be an accurate capture of the latent print as it was initially detected by FE Watts. No additional prints suitable for comparison were detected on Lab Item 8 or the other evidence listed in Lab Report #2019-01736-4.

Upon Analysis, FE Watts deemed the latent print suitable for comparison. DONOVAN CLOUD (a.k.a. DONOVAN Q. CLOUD, a.k.a. DONOVAN QUINN CLOUD) was listed in the incoming

communication from the evidence contributor as a subject for fingerprint comparison, and known cards bearing the name DONOVAN CLOUD (Lab Item 3) were received along with the other evidence. As dictated by LPOU standard operating procedure, FE Watts used available biographical information to retrieve additional known cards for DONOVAN CLOUD retained in the FBI's known card repository. These additional records were compared to Lab Item 3 to confirm that the known prints belonged to the same individual. This ten-print to ten-print identification was independently verified by another FBI-qualified latent print examiner.

Upon Comparison and Evaluation, the latent fingerprint detected on Lab Item 8, the rearview mirror, was identified by FE Watts to the #1 finger, or right thumb, recorded on the known cards bearing the name DONOVAN CLOUD. In accordance with LPOU quality assurance procedures, the identification was independently verified by another FBI-qualified latent print examiner who was blind to FE Watts' conclusion and the case details.

Based on her skills, knowledge, experience, education, and training, it is FE Watts' opinion that the overall degree of correspondence and concomitant lack of discordance between the latent and known prints would not be observed if the prints had originated from different sources. Although FE Watts is fully confident in the identification, because she did not physically witness the deposition of the latent print on Lab Item 8, the rearview mirror, it is not scientifically appropriate for FE Watts to express the identification as ground truth or in terms that suggest absolute certainty. Rather, FE Watts asserts there is extremely strong support for the proposition that the two prints came from the same source and extremely weak support for the proposition that the two prints came from different sources.

Limitations

The presence of a friction ridge print on an item of evidence indicates contact was made between the source and the item. The presence of a friction ridge print alone does not necessarily indicate the significance of the contact or the timeframe during which the contact occurred.

Due to a variety of factors, latent prints suitable for comparison are not always recovered. A lack of friction ridge prints or an exclusion of a friction ridge print to a given source does not prove that the given source never came into contact with the item. Likewise, an identification of a friction ridge print to a given source does not preclude the possibility that other sources touched the item as well.

End of Statement